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SIMCHA D. SCHONFELD, ESQ.\*  
JACOB J. SCHINDELHEIM, ESQ.

\*Also admitted in New Jersey

July 9, 2025

*Via Electronic Filing*  
Magistrate Judge Peggy Kuo  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

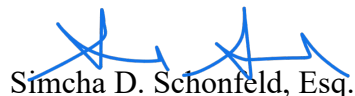
Re: *Margar Associates Limited Partnership v. Levitt et al.*  
Case No.: 1:25-cv-03267-NGG-PK  
Re: Order to Show Cause on Subject Matter Jurisdiction

Your Honor:

This office represents the Plaintiff in this action, and I write to supplement my letter of earlier today (Docket No. 11). My client has just been informed by Beth Gellman, that the will of her father, Yale H. Gellman, was indeed probated in the Philadelphia Register of Wills. She and her brother Russell Gellman, both Pennsylvania residents, were appointed as executors. As such, it is now confirmed that complete diversity does not exist, pursuant to 28 U.S.C. § 1332(c)(2) inasmuch as the decedent, his estate and its executors were and are all citizens of Pennsylvania. Therefore, since Defendant Michaels Management-Affordable LLC has asserted that it is a citizen of Pennsylvania, complete diversity does not exist.

In light of the forgoing, this Court does not have jurisdiction and the action should be remanded. Similarly, Defendants' motion for leave to file a response to the response to the response to the Order to Show Cause (Docket No. 12) should be denied.

Respectfully submitted,

  
Simcha D. Schonfeld, Esq.